



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

February 6, 2004

**Certified Mail No. 7099 3220 0009 1975 2720**

Jim Warren, Mill Manager  
Merritt Brothers Lumber Co.  
P.O. Box 190  
Athol, ID 83801

RE: AIRS Facility No. 055-00039, Merritt Brothers Lumber Co., Athol, Final Permit Letter

Dear Mr. Warren:

The Idaho Department of Environmental Quality (DEQ) is issuing modified Tier II Operating Permit/Permit to Construct (PTC) Number P-030103 for Merritt Brothers Lumber Co. in accordance with IDAPA 58.01.01.400 through 406 and IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit is effective immediately and is based on your permit application received on February 6, 2003.

This permit does not release Merritt Brothers Lumber Co. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Tom Harman of the Coeur d'Alene Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 or [wrogers@deq.state.id.us](mailto:wrogers@deq.state.id.us) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Martin Bauer".

Martin Bauer, Administrator  
Air Quality Division

CSA/DH/sd

Permit No. P-030103

Enclosures

cc: Tom Harman, Coeur d'Alene Regional Office  
Sherry Davis, Air Quality Division  
Laurie Kral, EPA Region 10  
Dustin Holloway, Permit Writer  
Bill Rogers, Permit Coordinator  
Marilyn Seymore, Data Entry  
Joan Lechtenberg, Public Comment  
Source File  
Reading File (Ltr Only)  
Phyllis Heitman, (Ltr Only)



**Air Quality  
TIER II OPERATING PERMIT  
And  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** P-030103  
**AIRS FACILITY NO.:** 055-00039  
**AQCR:** 62 **CLASS:** B  
**SIC:** 2421 **ZONE:** 11  
**UTM COORDINATE (km):** 521.6, 5310.2

**1. PERMITTEE**

Merritt Brothers Lumber Company – Remanufacturing Division

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

Post Office Box 190

**CITY**

Athol

**STATE**

ID

**ZIP**

83801

**4. FACILITY CONTACT**

Jim Warren

**TITLE**

Mill Manager

**TELEPHONE**

208-683-3321

**5. RESPONSIBLE OFFICIAL**

Jim Warren

**TITLE**

Mill Manager

**TELEPHONE**

208-683-3321

**6. EXACT PLANT LOCATION**

NE ¼ NW ¼ Section 16, Township 56 North, Range 3 West

**COUNTY**

Kootenai

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

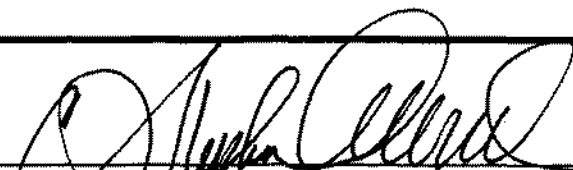
Dimensional lumber remanufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to the Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
G. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** February 6, 2004

**DATE EXPIRES:** November 26, 2007

## Table Of Contents

ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT SCOPE .....	4
2. FACILITY-WIDE CONDITIONS .....	5
3. BOILER.....	8
4. DRYING KILNS .....	9
5. CYCLONES, PLANER CYCLONE BAGHOUSE AND TARGET BOX .....	10
6. SUMMARY OF EMISSION LIMITS .....	11
7. FACILITY-WIDE EMISSIONS INVENTORY .....	12
8. GENERAL PROVISIONS .....	13

## Acronyms, Units And Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMbf	million board feet
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter of 10 micrometers or less
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification Code
SO <sub>2</sub>	sulfur dioxide
TSP	total suspended particulates
T/yr	tons per year
µm	micrometers
UTM	Universal Transverse Mercator
VOC	volatile organic compound
YR	year

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: P-030103**

Permittee	Merritt Brothers Lumber	AIRS Facility No. 055-00039	Date Issued:	February 6, 2004
Location	Athol, Idaho		Date Expires	November 26, 2007

**1. PERMIT SCOPE****Purpose**

- 1.1 The permit to construct portion of this permit is to fulfill the new source review requirements for the construction of the natural gas-fired boiler, wood working equipment, and three lumber drying kilns at the facility. The purpose of the Tier II operating permit is to allow the operations of all air pollution emitting activities at the facility while protecting ambient air quality standards. This combination permit also incorporates an existing PTC which was issued in 1992.
- 1.2 This permit incorporates and replaces PTC No. 005-50039 issued October 22, 1992.

**Regulated Sources**

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

**Table 1.1 REGULATED EMISSION SOURCES**

Permit Section	Source Description	Emission Controls
3	Cleaver Brooks gas-fired boiler, Model L-59569, 29.3 million Btu/hr, constructed in 11/74 and installed at the facility in 2/01	None
4	Lumber drying kilns (3), rated at 90 MMbf/yr, installed 2/01 and 3/02	None
5	Cyclone No. 1 - Old planer cyclone Cyclone No. 2 - Rip saw relay cyclone Cyclone No. 3 - Rip saw cyclone Cyclone and Baghouse No. 4 - New planer cyclone and baghouse Cyclone No. 5 - Finger-jointer cyclone Cyclone No. 6 - Finger-jointer cyclone (pull through) Cyclone No. 7 - Remanufacturing, chips cyclone, chip bin, target box	Cyclones and baghouse

**Permit Requirements Summary**

- 1.4 Table 1.2 below summarizes the action items required in this permit.

**Table 1.2 REPORTING, RECORDKEEPING, and MONITORING SUMMARY**

Requirement Description	Frequency	Permit Condition
Develop fugitive dust plan and submit for DEQ approval	Within 60 days of Permit issuance	2.2
Fugitive complaint log	As needed	2.3
Visible emission inspections of cyclones/baghouse/truck bins	Every calendar quarter	2.5
Maintaining on-site records	Five years	2.6
Monitor throughput of all kilns	Monthly and 12 month summation	4.5
Cyclone and baghouse daily hours of operation	Daily	5.5

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. P-030103**

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**2. FACILITY-WIDE CONDITIONS*****Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
  - Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
  - Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
  - Paving of roadways and their maintenance in a clean condition, where practical;
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 Within 60 days of the issuance date of this permit, the permittee shall submit to DEQ a fugitive dust management plan for approval. At a minimum, the plan shall identify all sources at the facility which may emit fugitive dust, appropriate dust control methods for each source, and recordkeeping procedures for documenting the frequency and methods used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Visible Emissions***

- 2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 055-00039**

Permittee	Merritt Brothers Lumber	AIRS Facility No. 055-00039	Date Issued:	February 6, 2004
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- 2.5 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential point source. If any visible emissions are present from an point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

**Monitoring and Recordkeeping**

- 2.6 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request

**Excess Emissions**

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**Reports and Certifications**

- 2.8 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814



**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. P-030103**

<b>Permittee</b>	Merritt Brothers Lumber	<b>AIRS Facility No.</b> 055-00039	<b>Date Issued:</b>	February 6, 2004
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***Fuel-burning Equipment***

- 2.9 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gaseous fuel.

***Open Burning***

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

***Air Stagnation Advisory Days***

- 2.11 The permittee shall comply with the Air Pollution Emergency Rule in IDAPA 58.01.01.550 through 562.

***Obligation to Comply***

- 2.12 Receiving this permit shall not relieve the owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: P-030103**

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**3. BOILER****3.1 Process Description**

The Cleaver Brooks boiler generates steam for the lumber dry kilns.

**3.2 Control Description**

Boiler emissions from the combustion of natural gas are uncontrolled.

***Emissions Limits*****3.3 Emissions Limits**

Emissions of NO<sub>x</sub> and CO from the boiler shall not exceed any corresponding emissions rate limits listed in the following table:

**Table 3.1 BOILER EMISSIONS LIMITS**

Source Description	NO <sub>x</sub>		CO	
	lb/hr	T/yr	lb/hr	T/yr
Gas-Fired Boiler	2.93	12.8	2.46	10.8

[PTC Requirement]

***Operating Requirements*****3.4 Boiler Fuel Specification**

The boiler shall burn only natural gas.

[PTC Requirement]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. P-03000**

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**4. DRYING KILNS****4.1 Process Description**

The facility consists of three lumber drying kilns used to dry green lumber. The dry kilns are heated using non-contact steam coils, with steam being supplied by a natural gas boiler.

**4.2 Control Description**

Kiln emissions from the lumber drying process are uncontrolled.

***Emission Limits*****4.3 Emission Limits**

Emissions from the drying kilns shall not exceed the following:

- PM – 14.9 T/yr
- PM<sub>10</sub> – 8.6 T/yr
- VOC – 67.5 T/yr

[PTC Requirement]

***Operating Requirements*****4.4 Maximum Facility Throughput**

The maximum lumber throughput to the drying kilns shall not exceed 90 MMbf/yr board scale in any consecutive 12-month summation period.

[PTC Requirement]

***Monitoring and Recordkeeping Requirements*****4.5 Lumber Throughput**

The permittee shall monitor and record, on a monthly and annual basis, the lumber throughput to the drying kilns. The amounts shall be recorded as million board feet per year (MMbf/yr) based on board scale, to demonstrate compliance with Permit Condition 4.4. The annual amount shall be based on a rolling 12-month summation.

[PTC Requirement]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. P-030103**

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**5. CYCLONES, PLANER CYCLONE BAGHOUSE AND TARGET BOX****5.1 Process Description**

The facility consists of several lumber processing areas, including remanufacturing, planer mill and a finger-jointing mill. Wood residuals (chips, shavings and wood dust) generated from these process areas are transferred to seven different cyclones where materials are separated from the air stream into two different truck bins.

**5.2 Control Description**

The planer shavings cyclone is followed by a baghouse in series. All other cyclones vent directly to the atmosphere.

***Emission Limits*****5.3 Emission Limits**

PM and PM<sub>10</sub> emissions from the cyclones and baghouse shall not exceed the following:

- PM – 22.7 T/yr
- PM<sub>10</sub> – 13.8 T/yr

[PTC Requirement]

***Operating Requirements*****5.4 Operating Hour Limits**

The cyclones and baghouse shall not be operated more than 20 hours per day.

[PTC Requirement]

***Monitoring and Recordkeeping*****5.5 Monitor Hours of Operation**

The permittee shall monitor and record the daily hours of operations of each cyclone and baghouse to demonstrate compliance with Permit Condition 5.4.

[PTC Requirement]

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**6. SUMMARY OF EMISSION LIMITS****MERRITT BROTHERS LUMBER COMPANY – ATHOL****Table 6.1 EMISSION LIMITS – HOURLY (lb/hr) AND ANNUAL (T/Yr)**

Source Description	PM		PM <sub>10</sub>		CO		NO <sub>x</sub>		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Gas-fired Boiler					2.46	10.8	2.93	12.8		
Drying Kilns		14.9		8.6						67.5
Cyclones, Planer Cyclone Baghouse and Target Box		22.7		13.8						

Notes: Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

PM and PM<sub>10</sub> limits include condensibles.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: P-030103**

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**7. FACILITY-WIDE EMISSIONS INVENTORY**

The following table represents the potential to emit for criteria air pollutants at Merritt Brothers Lumber. This table is for informational purposes only.

**Table 7.1 FACILITY EMISSION INVENTORY BASED ON PTE<sup>a,b</sup>**

SOURCE	PM <sub>10</sub> <sup>c</sup>	SO <sub>2</sub>	CO	NO <sub>x</sub>	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Gas-fired Boiler	1.0	0.1	10.8	12.8	0.7
Drying Kilns	8.6				67.5
Cyclones, Planer Cyclone Baghouse and Target Box	13.8				
Wood Handling Fugitives	0.4				
Total	23.8	0.1	10.8	12.8	68.2

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup> Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>c</sup> PM and PM<sub>10</sub> limits include condensibles.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. P-030103**

<b>Permittee</b>	Merritt Brothers Lumber	<b>AIRS Facility No. 055-00039</b>	<b>Date Issued:</b>	February 6, 2004
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**8. GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.